

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING  
LITIGATION**

**Case No. 2:23-md-3080 (BRM)(RLS)  
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI  
JUDGE RUKHSANAH L. SINGH**

**THIS DOCUMENT RELATES TO: ALL ACTIONS**

**CASE MANAGEMENT ORDER # \_\_\_\_  
(AMENDMENT TO INITIAL DISCOVERY PLAN)**

**I. Master Discovery Requests**

1. Plaintiffs in all MDL member actions and the *In re Direct Purchaser Insulin Pricing Litigation* (Case No. 20-03426) action shall collectively serve one set of Master Discovery Requests upon the Manufacturer Defendants and one set of Master Discovery Requests upon the PBM Defendants.
2. Manufacturer Defendants shall collectively issue one set of Master Discovery Requests upon each of the State AG and TPP Tracks, respectively. For the avoidance of doubt, Manufacturer Defendants need not serve the same set of Master Discovery Requests on the State AG and TPP Tracks.
3. PBM Defendants shall collectively issue one set of Master Discovery Requests upon each of the State AG and TPP Tracks, respectively. For

the avoidance of doubt, PBM Defendants need not serve the same set of Master Discovery Requests on the State AG and TPP Tracks.

4. There shall be a maximum of 30 Interrogatories and 30 Requests for Production per set in the Master Discovery Requests.
5. Each individual party shall serve Responses and Objections to Master Discovery Requests within 60 days of service of the Master Discovery Requests on liaison counsel for the track. For the avoidance of doubt, the obligations imposed by this Section apply to all parties participating in the State AG and TPP Track, and each individual plaintiff and defendant must respond to the Master Discovery Requests separately.
6. Any new Defendant or Plaintiff transferred to or joined in the State AG or TPP Track after the entry of this order shall raise any additional, non-duplicative objections to the Master Discovery Requests within 30 days of transfer or joinder and shall otherwise respond to pending requests within 60 days of transfer or joinder.
7. After responses to Master Discovery Requests are served and objections resolved, the parties will meet and confer regarding limited additional, non-duplicative requests, if any.

Dated:

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Hon. Rukhsanah Singh, U.S.M.J.